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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 CHRISTOPHER J. HADNAGY, an
13 individual; and SOCIAL-ENGINEER, LLC, a
14 Pennsylvania limited liability company,

15 Plaintiffs,

16 v.

17 JEFF MOSS, an individual; DEF CON
18 COMMUNICATIONS, INC., a Washington
19 corporation; and DOES 1-10; and ROE
20 ENTITIES 1-10, inclusive,

21 Defendants.

22 Case No.: 2:23-cv-01345-CDS-BNW

23 **DECLARATION OF CHRISTOPHER J.
24 HADNAGY IN SUPPORT OF
25 PLAINTIFFS' RESPONSE IN
26 OPPOSITION TO DEFENDANTS'
27 MOTION TO TRANSFER VENUE [ECF
28 NO. 15]**

1 **DECLARATION OF CHRISTOPHER J. HADNAGY IN SUPPORT OF PLAINTIFFS'**
2 **RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO TRANSFER VENUE**
3 **[ECF NO. 15]**

4 I, Christopher J. Hadnagy, under penalty of perjury, declare that the following is true
5 and correct:

6 1. I, Christopher J. Hadnagy, am over eighteen (18) years of age, and of sound mind and
7 body. I am competent to give this affidavit, and it is based upon my own personal knowledge. I
8 understand that this affidavit will be presented to the United States District Court of the District of
9 Nevada, in the above-captioned civil action.

10 2. I presently reside in Florida.

11 3. In 2010, I commenced offering social engineering services by writing books and
12 articles, offering classes and lectures, and attending and presenting at conferences. In 2013, I
13 formed Social-Engineer, LLC as a single member limited liability company in Pennsylvania
14 ("SE"). SE and I attended annual trade shows in Las Vegas, Nevada for business purposes from
15 2010 - 2019. These shows included Def Con Communications, Inc.'s annual Conference (the,
16 "Event"). They also included Black Hat USA's annual conference.

17 4. As part of SE's participation in the annual conference hosted by Def Con
18 Communications, Inc. (the "Event"), SE set up a booth that weighs two thousand (2,000) pounds
19 at the venue, in addition to signage and a lot of other equipment for the 4 days of events we ran at
20 the Event. Beginning in 2018, SE stored the booth year-round in a leased storage unit in Clark
21 County, Nevada. SE continues to maintain said lease where the booth remains.

22 5. SE's current employees reside in Pennsylvania, Rhode Island, Florida, Texas and
23 Colorado. Most of SE's employees have attended the Event with SE at some point.

24 6. The last time that SE had an employee who resided in Washington was approximately
25 2013.

26 7. Over the past ten (10) years, SE and I have visited Washington one time. The last time
27 SE had a Washington-based client was 2017.

28 8. In previously held proceedings in the United States District Court in the Eastern District

1 of Pennsylvania, the Defendants in this Action, Jeff Moss and Def Con Communications, Inc.
2 (“Defendants”) provided their Initial Rule 26 Disclosures.¹ In that prior action, Defendants
3 provided their Initial Rule 26 Disclosures on September 25, 2022. A true and correct copy of
4 Defendants’ counsel’s email transmission of the Disclosures to my prior counsel is attached hereto
5 as Exhibit “1”.

6 9. Exhibit “1” contains reference to the following individuals with whom I am personally
7 familiar:

8 a. Neil Wyler: I have known Mr. Wyler for 14 years, and have met with him on a
9 recurring basis at the Event as well as at Black Hat. Based on my personal and
10 professional knowledge, I am informed and believe that he resides in Utah.
11 b. Maxie Reynolds: I have known Ms. Reynolds for 3.5 years. She was an
12 employee of SE. Based on my personal and professional knowledge, I am
13 informed and believe that she resides in California.

14 10. I would encounter considerably more hardship if forced to litigate these claims in
15 Washington as opposed to Nevada. I presently have no business connections or dealings in
16 Washington and I do not have information pertaining to any legal counsel in Washington. Based
17 on personal recollection and all available information, I have only been to Washington one time
18 over the past 10 years. On the other hand, over the 9 years preceding the Covid-19 pandemic, I
19 traveled to Nevada regularly for approximately two weeks every year. I am very familiar with
20 Nevada which is more accessible and economically convenient for me than Washington.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 DATED: October 30, 2023

24 _____
25 _____
26 _____
27 _____
28 _____
/s/ Christopher Hadnagy
Christopher Hadnagy

1¹ *Hadnagy, et al. v. Moss, et al.*, No. CV22-3060 2023 WL 114689 (E.D. Pa. Jan. 5, 2023).

1 **INDEX OF EXHIBITS**

<u>Exhibit</u>	<u>Title</u>	<u>Page Numbers</u>
1	Defendants' Disclosures in Prior Action	147-154

CERTIFICATE OF SERVICE

I, Kristofer Riklis, hereby certify that the foregoing:

**DECLARATION OF CHRISTOPHER J. HADNAGY IN SUPPORT OF
PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO
TRANSFER VENUE [ECF NO. 15]**

was submitted electronically for filing and/or service with the United States District Court, District of Nevada's e-filing system on the 30th day of October, 2023. Electronic service of the foregoing document was be made in accordance with the E-Service List as follows:

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I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to: N/A

/s/ Kristofer Riklis
KRISTOFER RIKLIS, Esq.